UNITED STATES DISTRICT COURT DISTRICT OF NORTH DAKOTA

United States of America,)
Plaintiff,) Case No. 1:21-mj-00252
v.)
Jacob Bradley Demarais,) REQUEST FOR NOTICE) PURSUANT TO FED.R.EVID. 609(b)
Defendant.)

The above named Defendant, by and through counsel, Patrick Brooke, requests that the U.S. Attorney provide the undersigned with notice, pursuant to the Provisions of Fed.R.Evid. 609(b), of any conviction or convictions with respect to which a period of more than ten (10) years has elapsed since the date of the conviction, which the United States intends to offer at trial for the purpose of attacking the credibility of the Defendants or any witness, sufficiently in advance of trial so the Defendant is afforded a fair opportunity to contest the use of the evidence. The Defendant requests that notice of any conviction or convictions subject to the requirements of Fed.R.Evid. 609 be provided no later than the deadline set by the Court for the disclosure of discovery by the government or, if no order setting a deadline for the government's disclosure of discovery is entered, no later than fifteen (15) days before trial.

Dated this 16th day of June, 2021.

REDMANN LAW, P.C. 107 1st Ave NW Mandan, ND 58554 (701) 751-7188 *Attorneys for Defendant*

By: /s/ Patrick Brooke Patrick Brooke (ND ID #07999) pbrooke@redmannlawpc.com